The AMPLATZER® Septal Occluder System

Summary of Safety and Effectiveness Data

Table of Contents

1.	General Information	. 1
2.	Indications And Usage	. 1
3.	Contraindications	. 2
4.	Warnings and Precautions	. 2
5.	Device Description	. 2
6.	Alternative Practices or Procedures	. 4
7.	Marketing History	. 5
8.	Adverse Events	. 6
8.1 8.2	Adverse Events of the Device on Health	
9.	Summary Of Preclinical Studies	. 8
9.1 9.2 9.3 9.4 9.5 9.6	Useful Life (Sterilization/Shelf Life)	10 10 11 12
10.	Summary Of Clinical Studies	13
11.	Data Analysis and Results	15
12.	Device Failures and Replacements	17
13.	Conclusions Drawn From The Studies	17
	1 Atrial Septal Defects	
14.	Panel Recommendation	8
15.	CDRH Decision	18
16.	Approval Specifications	18

1. General Information

Device Generic Name: Transcatheter Atrial Septal Defect Occlusion Device

Device Trade Name: AMPLATZER® Septal Occluder and

AMPLATZER® Delivery System

Applicant's Name and Address: AGA Medical Corporation

682 Mendelssohn Avenue Golden Valley, MN 55427

USA

Date(s) of Panel Recommendation:

Premarket Approval Application (PMA) Number: P000039

Date of Good Manufacturing Practice Inspection: October 2000

Date of Notice of Approval to Applicant:

2. Indications And Usage

The AMPLATZER Septal Occluder is a percutaneous, transcatheter, atrial septal defect closure device intended for the occlusion of atrial septal defects (ASD) in secundum position. Patients indicated for ASD closure have echocardiographic evidence of ostium secundum atrial septal defect and clinical evidence of right ventricular volume overload or have clinical symptoms such as paradoxical embolism or atrial dysrhythmia in the presence of a minimal shunt.

The device is also indicated in those patients who have undergone a fenestrated Fontan procedure and who now require closure of the fenestration.

3. Contraindications

- Any patient known to have extensive congenital cardiac anomaly which can only be adequately repaired by way of cardiac surgery.
- Any patient known to have local or generalized sepsis, or any systemic infection that cannot be successfully treated prior to device placement.
- Any patient known to have a bleeding disorder, untreated ulcer or any other contraindications to aspirin therapy, unless another anti-platelet agent can be administered for 6 months.
- Any patient known to have a demonstrated intracardiac thrombi on echocardiography (especially left atrial or left atrial appendage thrombi).
- Any patient whose size or condition would cause the patient to be a poor candidate for cardiac catheterization.
- Any patient with the margins of the defect <5mm to the coronary sinus, AV valves and right upper lobe pulmonary vein.

4. Warnings and Precautions

The warnings and precautions can be found in the AMPLATZER Septal Occluder final labeling (Instructions for Use).

5. Device Description

The AMPLATZER® Septal Occluder is a self-expandable, double disc device made from a Nitinol wire mesh. The two discs are linked together by a short connecting waist corresponding to the size of the ASD. In order to increase its closing ability, the discs and the waist are filled with polyester patches. The polyester patches are securely sewn to each disc by a polyester thread.

Device Specifications

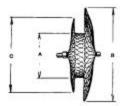


Table 1 - Device Specifications / Recommended sheath sizes

	A	В		С	
Order	DEVICE SIZE	LA DISC	WIDTH OF	RA DISC	RECOMMENDED
Number	(=STRETCHED	DIAMETER	CONNECTING	DIAMETER	SHEATH SIZE
	ASD)		WAIST		
9-ASD-004	4 mm	16 mm	3 mm	12 mm	6-7 French
9-ASD-005	5 mm	17 mm	3 mm	13 mm	6-7 French
9-ASD-006	6 mm	18 mm	3 mm	14 mm	6-7 French
9-ASD-007	7 mm	19 mm	3 mm	15 mm	6-7 French
9-ASD-008	8 mm	20 mm	3 mm	16 mm	6-7 French
9-ASD-009	9 mm	21 mm	3 mm	17 mm	6-7 French
9-ASD-010	10 mm	22 mm	3 mm	18 mm	6-7 French
9-ASD-011	11 mm	25 mm	4 mm	21 mm	7 French
9-ASD-012	12 mm	26 mm	4 mm	22 mm	7 French
9-ASD-013	13 mm	27 mm	4 mm	23 mm	7 French
9-ASD-014	14 mm	28 mm	4 mm	24 mm	7 French
9-ASD-015	15 mm	29 mm	4 mm	25 mm	7 French
9-ASD-016	16 mm	30 mm	4 mm	26 mm	7 French
9-ASD-017	17 mm	31 mm	4 mm	27 mm	7 French
9-ASD-018	18 mm	32 mm	4 mm	28 mm	8-9 French
9-ASD-019	19 mm	33 mm	4 mm	29 mm	8-9 French
9-ASD-020	20 mm	34 mm	4 mm	30 mm	8-9 French
9-ASD-022	22 mm	36 mm	4 mm	32 mm	9 French
9-ASD-024	24 mm	38 mm	4 mm	34 mm	9 French
9-ASD-026	26 mm	40 mm	4 mm	36 mm	10 French
9-ASD-028	28 mm	42 mm	4 mm	38 mm	10 French
9-ASD-030	30 mm	44 mm	4 mm	40 mm	10 French
9-ASD-032	32 mm	46 mm	4 mm	42 mm	10 French
9-ASD-034	34 mm	50 mm	4 mm	44 mm	12 French
9-ASD-036	36 mm	52 mm	4 mm	46 mm	12 French
9-ASD-038	38 mm	54 mm	4 mm	48 mm	12 French

The AMPLATZER® Delivery System includes:

- **Delivery sheath** with Touhy-Borst adapter used to deliver the device.
- **Dilator** used to ease penetration of tissue.
- **Loading Device** used to introduce the AMPLATZER Septal Occluder into the delivery sheath.
- **Plastic Vise** facilitates directional control and serves as the "handle" for disconnecting (unscrewing) the delivery cable from the device.
- **Delivery Cable** the device is screwed onto the distal tip of the delivery cable, which allows for placement (and if necessary, retrieval) of the device.

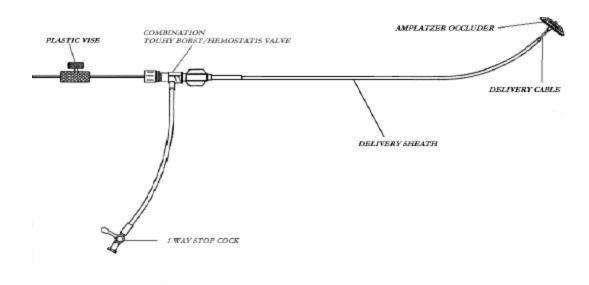


Figure 1 AMPLATZER Septal Occluder Device and Delivery System

6. Alternative Practices or Procedures

The only alternative to device closure of an ASD is open-heart surgery. Cardiac surgery that is required for closure of such defects is a major procedure that requires cardiopulmonary bypass. It requires 3-5 days hospitalization, and entails a midline thoracotomy with its attendant pain and subsequent need for wound healing. Surgery, however, is relatively safe with a mortality of less than 1%. If the patient suffers from coexistent medical illnesses such as pulmonary disease, diabetes, renal failure, etc., the risks of surgery are higher.

7. Marketing History

These devices have not been marketed in the United States. The AMPLATZER Septal Occluder and Delivery System received the CE Mark in 1998. Additionally the AMPLATZER Septal Occluder and Delivery System has been marketed in the following countries:

Africa India Saudi Arabia Argentina Israel Singapore Australia Italy Slovakia Austria Jordan Spain Belgium Korea Sweden Brazil Kuwait Switzerland Canada Lebanon Taiwan Chile Malaysia Thailand

ChinaMexicoThe NetherlandsColombiaMonacoTunisia

Costa Rica New Zealand Turkey

Czech Republic Norway United Kingdom

Denmark Pakistan Uruguay
Finland Poland Venezuela

France Portugal
Germany Russia

Greece

Hong Kong

The AMPLATZER Septal Occluder has not been withdrawn from marketing for any reason relating to the safety and effectiveness of the device. The AMPLATZER Delivery Systems were voluntarily recalled by AGA Medical due to reports of dislodgment and embolization of the delivery sheath distal tip marker band. The sheaths are no longer manufactured with marker bands.

8. Adverse Events

8.1 Adverse Events of the Device on Health

The AMPLATZER Septal Occluder was evaluated in a multi-center, non-randomized, pivotal study comparing the device to surgical closure of atrial septal defects; 423 patients received 433 devices with a total device exposure of 911.5 years. Individual patient exposure to the device averaged 25.6 months (ranging from 0 to 38.9).

A Registry group was also studied to evaluate the device in patients with other conditions appropriate for device closure. Forty-eight (48) patients with Fenestrated Fontan (communication in the baffle with at least 5mm distance from the free atrial wall and central venous pressure less than 15Hg) were enrolled in the study.

There was one death reported in the pivotal study (device group) and no deaths were reported in the Fenestrated Fontan Registry Group. The Data Safety Monitoring Board determined that the death was not device or procedure related.

Table 1 Complications – Pivotal Study

Major Complication	AMPLATZER Patients	Surgical Control Patients	p-value
Cardiac Arrhythmia requiring major treatment	2/442 (0.5%)	0/154 (0.0%)	1.00
Device Embolization with surgical removal	3/442 (0.7%)	0/154 (0.0%)	0.57
Device Embolization with percutaneous removal	1/442 (0.2%)	0/154 (0.0%)	1.00
Delivery System Failure	1/442 (0.2%)	0/154 (0.0%)	1.00
Pericardial Effusion with tamponade	0/442 (0.0%)	3/154 (1.9%)	0.017
Pulmonary Edema	0/442 (0.0%)	1/154 (0.6%)	0.26
Repeat Surgery	0/442 (0.0%)	2/154 (1.3%)	0.066
Surgical Wound Complication	0/442 (0.0%)	2/154 (1.3%)	0.066
Total Major Complications Patients	7/442 (1.6%)	8/154 (5.2%)	0.030

Table 1 Complications – Pivotal Study (continued)

Minor Complications	AMPLATZER Patients	Surgical Control Patients	p-value
Anemia	0/442 (0.0%)	1/154 (0.6%)	0.26
Allergic reaction (drug)	2/442 (0.5%)	0/154 (0.0%)	1.00
Atelectasis	0/442 (0.0%)	1/154 (0.6%)	0.26
Cardiac Arrhythmias Minor Treatment	15/442 (3.4%)	9/154 (5.8%)	0.23
Device Embolization with percutaneous removal	1/442 (0.2%)	0/154 (0.0%)	1.00
Extremity Tingling/Numbness	1/442 (0.2%)	0/154 (0.0%)	1.00
Headaches/Possible TIA	2/442 (0.5%)	0/154 (0.0%)	1.00
Delivery System Failure	2/442 (0.5%)	0/154 (0.0%)	1.00
Pericardiotomy Syndrome	0/442 (0.0%)	2/154 (1.3%)	0.066
Pericardial effusion	0/442 (0.0%	6/154 (3.9%)	< 0.001
Pleural Effusion	0/442 (0.0%)	1/154 (0.6%)	0.26
Pneumothorax	0/442 (0.0%)	3/154 (1.9%)	0.017
Staph Infection	0/442 (0.0%)	1/154 (0.6%)	0.26
Surgical Wound Complications	0/442 (0.0%)	1/154 (0.6%)	0.26
Thrombus formation	3/442 (0.7%)	0/154 (0.0%)	0.56
Transfusions	0/442 (0.0%)	2/154 (1.3%)	0.066
Upper Respiratory Infection/Fever	0/442 (0.0%)	2/154 (1.3%)	0.066
Urinary Tract Disturbance	1/424 (0.2%)	0/154 (0.0%)	1.00
Total Minor Complications (Patients)	27/442 (6.1%)	29/154 (18.8%)	< 0.001

Table 2: Complications -FF

	AMPLATZER Patients	Upper 95% Confidence Bound
Major Complication		
Repeat Surgery	1/48 (2.1%)	0.095
Hemothorax	1/48(2.1%)	0.095
Minor Complication		
Vomiting (required 2 nights in hospital)	1/48 (2.1%)	0.095
Atrial fibrillation/cardioversion	1/48 (2.1%)	0.095
Total Complications	4/48 (8.3%)	0.181

8.2 Potential Adverse Events

Placement of the AMPLATZER Septal Occluder involves using standard interventional cardiac catheterization techniques. The following adverse events (listed in alphabetical order) might be expected from interventional cardiac catheterization techniques.

- Air embolus
- Allergic dye reaction
- Anesthesia reactions
- Apnea
- Fever

- Hypertension/hypotension
- Infection including endocarditis
- Perforation of vessel or myocardium
- Pseudoaneurysm including blood loss requiring transfusion
- Valvular regurgitation

9. Summary Of Preclinical Studies

9.1 Bench Testing

Bench testing was done to ensure that all initial design requirements were met. Bench testing has demonstrated the strength and reliability of the device. Design verification of the device and its components has been conducted to verify that the device is safe for its intended use.

Table 3 Summary of AMPLATZER Septal Occluder Testing

Test	San	ıples	Specification			Results	
	Wire	N	•	Wire]		(range) lbs
Pull Test	Dia.		<u>.004006" diameter wire</u>	diame			
Laser Weld –	.004"	9	>12 lbs	.004"		30.3 ± 2.6 ((26.3-35.5)
Marker Bands to Wire Braid	.005"	10	.007" diameter wire	.005"		36.79 <u>+</u> 3.3	(32.9 – 40)
Who Blaid	.006"	11	>24 lbs	.006"		37.6 <u>+</u> 3.8 (29.9 – 42.6)
	.007"	5		.007"	4	49.8 <u>+</u> 6.2 ((41.2 - >55)
	.008"	5	.008" diameter wire > 32.2 lbs	.008"	4	All samples	s exceeded 55 lbs
Pull Test	Wire	N		Wire]	Mean <u>+</u> SD	(range) lbs
Laser Weld-	Dia.		.004006" diameter wire	Diame	eter		
Screw Attachment to	.004"	5	>12 lbs	.004"		34.8 ± 7.6	(28.3-45.3)
Marker Bands	.005"	7	.007" diameter wire	.005"	,	38.3 <u>+</u> 5.8 (31.1 – 47)
	.006"	10	>24 lbs	.006"	4	47.9 <u>+</u> 4.9 ((34.95 – >50)
	.007"	5		.007"	4	49.8 <u>+</u> 6.2 ((41.2 - >55)
	.008"	5	.008" diameter wire > 32.2 lbs	.008"		All samples	s exceeded 55 lbs
Pull Test					Mea	n +SD (ra	nge) lbs
Delivery Cable		5	12 lbs				
screw and device					26.4	<u>+</u> 2.3 (23.4	– 29.15)
end screw		1	Ctury atrianal Intercentity marget many aim	Ctmot	rol into	arity rama	ined intact when
Device Integrity		1	Structural Integrity must remain intact.				vere cut, as well as
				when t		trial disc pos	st was cut.
Life Cycle		00	Structural integrity must remain	Size	Wire	#	Description of
	,	ach of	intact after 400 million cycles		dia.	Fail	findings
		nallest rgest		10	.004"	0	
		ce in		11	.005"	0	
		of the		17	.005"	2	1) 1 broken
	w	ire		1,	.002		wire near
	diam	eters)					end screw
							2) 1 broken wire near
							marker band
	İ			18	.006"	0	
				24	.006"	1	Broken wires in
							waist. Brass
							metal shaving found
							sandwiched
							between the two
							device discs
				26	.007"	0	during removal
				34	.007	-	
				34	.008"	0	
				40	.008"	0	

SSED 6 September, 2001 Page 9

 $^{^*}$ Initially, the 34mm device was manufactured with .007" wire. It was later changed to .008" wire.

Table 4 Summary of AMPLATZER Delivery System Testing

Test	Sample	es	Specification	Results	
Delivery Sheath	Size	N		Size	Mean + SD (range) degrees
Kink Resistance	6F	4	The sheath must	6F	131.3 ± 4.8 (125 – 135)
	7F	4	not kink during	7F	118.8 ± 2.5 (115 – 120)
	8F	4	normal clinical	8F	112.5 ± 6.5 (105 – 120)
	9F	4	use.	9F	112.5 ± 2.9 (110 – 115)
	10F	5		10F	$106 \pm 5.5 (100 - 110)$
	12F	5		12F	129 ± 4.2 (125 – 135)
Delivery Cable			The cable must	N	Mean \pm SD (range) degrees
Kink Resistance		10	not kink during		100 5 5 0 (100 115)
			normal clinical		128.5 ± 7.8 (120-145)
		1	use.		
Pull Tests -	Size	N		Size	Mean + SD (range) lbs
Delivery Sheath	6F	4	Pull strength must	6F	8 ± 1.3 (6.85 – 9.25)
Hub to Tubing	7F	4	not be <3lbs.	7F	$10.5 \pm 0.1 (10.3 - 10.7)$
	8F	4		8F	11.3 ± 0.1 (11.3 – 11.5)
	9F	4		9F	11.6 ± 0.1 (11.5 – 11.8)
	10F	5		10F	14.3 ± 0.1 (14.2 – 14.4)
	12F	5		12F	$17.3 \pm 1.0 (16.2 - 18.7)$
Pull Test – Delivery Cable					Mean <u>+</u> SD (range) lbs
- Cable to Cable Screw		10	12 pounds		- '
Weld Joint					46.1 ± 5.5 (37 - >50)

9.2 MRI Compatibility

The AMPLATZER Septal Occluder was tested to determine MRI Compatibility. No magnetic forces could be detected, and the device proved to be MRI compatible.

9.3 Corrosion Testing

9.3.1 Comparison evaluation between NiTi and 316SS

Further bench testing was conducted to compare the corrosion potential of Nitinol vs 316 Stainless Steel. Samples were prepared and formed per the recommendation of ASTM F746. The surface of the Nitinol sample was severed with a knife in order to address the issue of corrosion after destruction of the passive layer owing to abrasion.

The Nitinol sample did not display the general pitting found on the 316SS sample. In addition, there was no indication of crevice corrosion on the nickel-titanium sample as was seen on both the 316 SS samples.

Due to the lack of general pitting or crevice corrosion, indicates that nickel titanium alloy material should be superior in performance when compared to 316SS.

9.3.2 Corrosion – Bench Testing

Eight devices were tested for corrosion potential. The devices were degreased, rinsed with deionized water and blown with dry air. The electrolyte was prepared by dissolving 36.9g reagent grade sodium chloride in deionized

water. After transfer to the corrosion cell, the electrolyte was deoxygenated by sparging with zero grade nitrogen for a minimum of 60 minutes.

The devices were suspended in the corrosion cell and maintained in the electrolyte at open circuit for 60 minutes before beginning the polarization scan (0.6 V/h). The electrochemistry was performed with a PAR 263 Potentiosatat.

In all devices the onset of corrosion occurred ca. 0.08~V from the open circuit potential. The corrosion potential (E_{CORR}) for the samples tested varied by ca. 0.08~V. The shape of the hysteresis curve indicates that localized corrosion may occur.

9.3.3 Corrosion – Animal Testing

Post mortem examination was conducted in an animal specimen wherein two devices were implanted (device #1 – implanted 18 months and device #2 implanted 14 months). Although the animal was implanted with the AMPLATZER Muscular Ventricular Septal Occluder device, materials and methods are identical to the AMPLATZER Septal Occluder.

Analysis revealed both devices were nearly covered by neoendocardium. Gross inspection revealed no wire breakage. Light microscopy at 40x revealed a smooth surface. Scanning electron microscopy was carried out and compared to a new control wire. Both surfaces appear identical. No evidence of corrosion was observed for any of the devices. The wire surface appearance was typical of oxidized Nitinol wire.

Both devices were weighed (275 mg and 156 mg). If a corrosion of 10% would have been present which should have produced huge craters upon 3000 magnification, the daily dose of nickel would have been 15.4 micrograms per day which is 33 times less than the daily intake of nickel with a standard 2500 calorie diet

9.3.4 Abrasion

A device was explanted from a swine after 3 months (at least 26 million cycles). A biopsy was taken from the neo-endocardium for histologic examination. The device was examined grossly, by light microscopy and by scanning electron microscopy (SEM). No broken wires were detected.

SEM examination was made at randomly selected wire intersection on both the large and small discs. The typical condition of the wires at the intersections was photographed. Results indicate that there are no signs of intersecting wires abrading each other.

9.4 Biocompatibility Tests

The AMPLATZER Septal Occluder is constructed of Nitinol (a nickel-titanium alloy) and polyester. Sufficient information from the literature exists to

demonstrate biocompatibility of the Nitinol for use in an implantable device. 1,2,3

The polyester fabric and the patient contacting components of the delivery system underwent biocompatibility testing in accordance with FDA General Program Memorandum G95-1, which provides an FDA-modified matrix of International Standard ISO 10993, "Biological Evaluation of Medical Devices Part 1: Evaluation and Testing."

Result Test Polyester Fabric Delivery System Cytotoxicity Pass Pass Sensitization Non-sensitizer Non-sensitizer Hemolysis Non hemolytic Non-hemolytic Intracutaneous Injection (Irritation) Pass Pass Toxicity Pass (Subchronic) Pass (Systemic) Acute Systemic Injection Pass Not required Ames Salmonella Mutagenicity No mutagenic activity Not required **Implantation** Pending Not required Pending Not required Chronic Toxicity

Table 5 – Summary of Biocompatibility Testing

9.5 Useful Life (Sterilization/Shelf Life)

The AMPLATZER Septal Occluder and Delivery System are single-use devices which are provided pre-sterilized (via ethylene oxide) to the user. The sterilization cycle was validated to ensure successful sterilization to a Sterility Assurance Level (SAL) of 10^{-6} .

Product and package stability testing of the AMPLATZER Septal Occluder and Delivery System was performed. Visual inspection and physical testing indicated that the device performed within product specification for up to 3 years. Based upon these results, an expiration date of 3 years has been established.

9.6 Animal Testing

Animal studies were conducted to evaluate the device design and to demonstrate that the AMPLATZER Septal Occluder was capable of providing rapid closure and endothelialization of atrial septal defects without evidence of residual shunting. Twelve (12) Yucatan minipigs underwent surgical creation of an atrial septal defect and were allowed to recover for 10-14 days. The animals were then implanted with the AMPLATZER Septal Occluder.

¹ Castleman LS, Motzkin SM, Alicandri FP, et al. Biocompatibility of Nitinol Alloy as an Implant Material. *J of Biomedical Materials Research* 1976; 10:695-731.

J of Biomedical Materials Research 1976; 10:695-731.

² Cragg AH, De Jong SC, Barnhardt WH, et al: Nitinol Intravascular Stent: Results of Preclinical Evaluation. Radiology 1993; 189-775.

³ Prince MR, Salzman EW, Schoen, FJ, et al: Local Intravascular Effects of the Nitinol Blood Clot Filter. *Investigative Radiology* 1998; 23:294-300.

Sequential angiographic studies and blood gas measurements were repeated at one week, one month and three month intervals. The animals were then euthanized with removal of the heart and lungs for gross and histologic examination.

At 3 months all animals studied exhibited complete endothelialization by neoendothelium. This tissue in-growth demonstrated that the device was firmly fixed into position and was covered by a glistening non-thrombogenic layer of cells. In this final state, it was apparent that no thrombosis, shunting or dislodgment occurred.

10. Summary Of Clinical Studies

10.1 Objective

The objective of the study was to compare the clinical performance of the AMPLATZER Septal Occluder device for atrial septal defect (ASD) closure with that documented for the ASD Surgical Repair Procedure. A Registry Group was also studied to evaluate the device in patients with Fenestrated Fontan.

10.2 Study Design

A multi-center, non-randomized, controlled clinical study was performed to evaluate the safety (incidence of major complications) and effectiveness (closure of the defect defined as < 2mm shunt) of the AMPLATZER Septal Occluder.

Pivotal Study

Enrolled patients had echocardiographic evidence of ostium secundum atrial septal defect (device group: defect size \leq 38mm) and clinical evidence of right ventricular volume overload or had clinical symptoms such as paradoxical embolism or atrial dysrhythmia in the presence of a minimal shunt. Exclusion criteria included:

- Patients with multiple defects that could not be adequately covered by the device (device group only).
- Associated congenital cardiac anomalies requiring surgery.
- Ostium primum or sinus venosus atrial septal defects.
- Partial anomalous pulmonary venous drainage.
- Pulmonary vascular resistance above 7 Woods units or a right-to-left shunt at the atrial level with a peripheral arterial saturation < 94%.
- Patients with recent myocardial infarction, unstable angina and decompensated congestive heart failure.
- Patient with right and/or left ventricular decompensation with ejection fraction < 30%.
- Sepsis (local/generalized).
- History of repeated pulmonary infection.
- Any type of serious infection < 1 month prior to procedure.
- Malignancy where life expectancy was < 2 years.
- Demonstrated intracardiac thrombi on echocardiography.
- Weight < 8 Kilograms.

- Inability to obtain informed consent.
- Patients with gastritis, gastric ulcer, duodenal ulcer, bleeding disorders etc. and other contraindications to aspirin therapy unless other anti-platelet agents can be administered for 6 months.

Registry Group

The inclusion criteria for the Registry group were:

• **Fenestrated Fontan** (communication in the baffle with at least 5mm distance from the free atrial wall and central venous pressure less than 15Hg).

10.3 Patient Description and Accountability

Patients were enrolled into the pivotal study from March 1998 through March 2000 at 29 centers in the United States. Device placement was attempted in 442 patients. In 18 patients the device was recaptured prior to releasing from the delivery cable and in 1 patient the device embolized immediately upon release from the cable.. Thus 423 patients received devices. ASD surgical data was collected prospectively in 117 patients and retrospectively in 37 patients.

Table 6: Patient Baseline Demographics

Variable		AMPLATZER Patients	Surgical Control Patients	p-value
Age (years)	Mean±s.d.(N)	$18.1 \pm 19.3 (442)$	$5.9 \pm 6.2 (154)$	< 0.001
	[range]	[0.6, 82.0]	[0.6, 38.2]	
Gender				
Female		299/442 (67.6%)	94/154 (61.0%)	0.14
Male		143/442 (32.4%)	60/154 (39.0%)	
Height (cm)	Mean±s.d.(N)	$134.6 \pm 32.0 (440)$	$105.5 \pm 26.9 (151)$	< 0.001
	[range]	[58,188]	[60,178]	
Weight (kg)	Mean±s.d (N)	42.3 ±27.3 (440)	$20.6 \pm 15.2 (153)$	< 0.001
	[range]	[6.3,130]	[4.8,78.4]	
Medical Histor	У			
CHF		11/442 (2.5%)	7/154 (4.5%)	0.27
Failure to T	hrive	14/442 (3.2%)	13/154 (8.4%)	0.012
CAD		9/442 (2.0%)	0/154 (0%)	0.12
Respiratory	Infections	7/442 (1.6%)	13/154 (8.4%)	< 0.001
TIA		6/442 (1.4%)	1/154 (0.6%)	0.68
COPD		1/442 (0.2%)	0/154 (0%)	1.00
Hypertensio	on	16/442 (3.6%)	0/154 (0%)	0.016
Stroke		13/442 (2.9%)	0/154 (0%)	0.026
Recurrent S	trokes/TIA's	5/442 (1.1%)	1/154 (0.6%)	1.00
Diabetes		4/442 (0.9%)	0/154 (0%)	0.58

Table 7: Pre-Closure – Fenestrated Fontan

Age (years)	Mean±s.d (N) [range]	7.8 ± 6.9 (48) [1.6, 44.9]
Gender: Female	[8-]	29/48 (60.4%)
Height (cm)	Mean±s.d.(N)	$114.5 \pm 25.2 (46)$
	[range]	[78,168]
Weight (kg)	Mean±s.d (N)	22.4 ± 13.5 (48)
	[range]	[9.7, 68.7]
Medical History	:	
CHF		1/48 (2.1%)
Failure to thr	ive	1/48 (2.1%)
Stroke		2/48 (4.2%)
Heart Murmur		26/47 (55.3%)
Pulmonary Ejec	tion Murmur	2/47 (4.3%)
Mid Diastolic M	Iurmur	1/47 (2.1%)
Right axis devia	tion	11/45 (24.4%)
Peaked p waves		1/45 (2.2%)
Cardiomegaly	_	20/45 (44.4%)

11.Data Analysis and Results

Patients with ostium secundum atrial septal defects and clinical evidence of right ventricular volume overload who were being evaluated for ASD closure underwent physical examination which included: heart murmur classification; an electrocardiogram (EKG) to document cardiac electrical characteristics; a chest x-ray to evaluate heart size and pulmonary vasculature; a detailed 2D Color Doppler Transthoracic Echo (TTE) to evaluate the atrial septal defect location, number of ASD's, size of the ASD's, and distance from the ASD to the coronary sinus, pulmonary vein, and AV valves.

The patients were instructed to avoid strenuous activity for a period of one month. and to take aspirin for 6 months post placement (3-5mg/kg/day). Additionally, patients were examined and a transthoracic Echocardiogram (TTE) was conducted at 24 hours, 6 months and 1 year. Post-discharge data was collected in surgical patients when available. Ninety-four (94) surgical repair patients were confirmed to be closed by echo at 12 months. All were assumed closed at 12 months. Trivial and small shunts were considered hemodynamically insignificant.

An independent core lab assessed a subset of echo videotapes for 12-month shunt status; a Data Safety Monitoring Board adjudicated all adverse events.

Table 8: Principal Effectiveness and Safety Results - Pivotal Study

	AMPLATZER Patients ¹	Surgical Control Patients	90% Confidence Interval
Technical Success	423/442 (95.7%)	154/154 (100.0%)	(-0.084,-0.010)
Procedure Success	413/423 (97.6%)	154/154 (100.0%)	(-0.059, +0.008)
Early (≤ 30 days) Composite Success	401/442 (90.7%)	148/154 (96.1%)	(-0.111, -0.005)
12-month Composite Success	311/362 (85.9%)	146/154 (94.8%)	(-0.153, -0.033)
24-hour Closure Success	404/418 (96.7%)	154/154 (100%)	(-0.073, -0.001)
6-month Closure Success	376/387 (97.2%)	154/154 (100%)	(-0.068, +0.003)
12-month Closure Success	326/331 (98.5%)	149/149 (100%)	(-1.052, 0.017)
Principal Safety Measures			
Major Complications 12-months	7/442 (1.6%)	8/154 (5.2%)	(-0.090, -0.002)
Minor Complications 12-months	27/442 (6.1%)	29/154 (18.8%)	(-0.200, -0.070)
12-month Composite Success (K-M)	0.889	0.938	[-0.101, +0.003]
Survival at 30 days (K-M)	0.909	0.956	[-0.091, -0.003]
Survival at 180 days (K-M)	0.902	0.947	[-0.092, +0.002]

¹Unit of analysis = Patient. Although 10 patients had 2 defects each treated with an AMPLATZER Septal Occluder; all patients with multiple AMPLATZER implants were successfully treated.

Technical Success: successful deployment of the device, or the successful completion of the surgical procedure.

Procedure Success: successful closure of the defect as measured immediately following the procedure (< 2 mm residual shunt)

Composite Success: All device placement attempts without a major complication, surgical reintervention, embolization, technical failure or major shunt (defined as > 2 mm).

Closure Success: among patients that were technical successes, closure of the atrial septal defect (defined as a shunt ≤ 2 mm) without the need for surgical repair.

Major Complications: Events that are life threatening, prolong hospitalization or have long-term consequences or need for ongoing therapy. These include but are not limited to cerebral embolism, cardiac perforation with tamponade, endocarditis, pericardial effusion with tamponade, repeat surgery, death, cardiac arrhythmias requiring permanent pacemaker placement or long term anti-arrhythmic medication and device embolizations requiring immediate surgical removal.

Minor Complications: Device embolization with percutaneous retrieval, cardiac arrhythmia with treatment, phrenic nerve injury, hematoma, other vascular access site complications, retroperitoneal hematoma, surgical wound complications, other procedural complications, pericardial effusion requiring medical management, evidence of device associated thrombus formation without embolization (with or without treatment) and marker band embolization without known sequelae.

Table 9: Principal Efficacy Results—FF

		AMPLATZER Patients	Lower 95% Confidence Bound
Technical Success		46/48 (95.8%)	0.875
Procedure Success		46/46 (100.0%)	0.937
Early Composite Success		44/48 (91.7%)	0.819
6 month Success		38/38 (100.0%)	0.924
Primary Efficacy Outcome (12 month		32/32 (100.0%)	0.911
Success)			
Hospital days	Mean±s.d. (N)	1.2± 0.7 (39)	(0.95, 1.41)
	[range]	[0.0, 4.0]	

	AMPLATZER Patients ¹	Upper 95% Confidence Bound
Major complications	2/48 (4.2%)	0.125
Minor Complications	2/48 (4.2%)	0.125
Total complications	4/48 (8.3%)	0.181

Table 10: Principal Safety Results – FF

12. Device Failures and Replacements

Device: Reported device failures include deformed upon deployment ("cobra") and immediate device embolization

Delivery System: Marker band embolization, sheath kink/accordian, and leaking hubs have been reported for the delivery system.

13. Conclusions Drawn From The Studies

13.1 Atrial Septal Defects

Effectiveness of the AMPLATZER Septal Occluder for treatment of atrial septal defects has been demonstrated by:

- Successful closure of ASD's at 12-month follow-up without the need for additional surgical repair in 326 out of 331 patients.
- These results are statistically equivalent to the 100% rate reported for the ASD Surgical Repair Control group. The Lower 95% confidence bound for the difference in 12-month success rate is XXXX, which is greater than the protocol specified requirement of -.08.
- The complication rates associated with the use of the AMPLATZER device at 12 months are within the protocol-defined acceptable limits. The mortality rate for the device cohort was 0%, which is less than the proposed 2%; the major complication rate for AMPLATZER patients was 1.6%, which is less than the proposed 10% rate. The overall AMPLATZER complication rate (7.2%) was statistically significantly lower than that reported for the control group (24.0%) (p = <0.001).
- In addition to a high rate of effectiveness and a low risk of major complications, the mean length of hospital stay for AMPLATZER patients of 1 day is statistically significantly lower than the mean of 3.4 days documented for the ASD Surgical Repair control group (p <0.001).

¹Unit of analysis = patient

13.2 Fenestrated Fontan

Effectiveness of the AMPLATZER Septal Occluder for treatment of Fenestrated Fontans has been demonstrated by:

- Results consistent with those obtained for treatment of ASD.
- Primary Efficacy Outcome at 12 months follow-up without the need for additional surgical repair in 32 of 32 patients, obviates the need for a second surgical procedure in this patient population.
- The complication rates associated with the use of the AMPLATZER device at 12 months are within the protocol-defined acceptable limits. The mortality rate for the device cohort was 0%, which is less than the proposed 2%; the major complication rate for AMPLATZER patients was 4.2%, which is less than the proposed 10% rate.

In conclusion, the AMPLATZER® device operates as designed and is safe and effective in the clinical environment in the intended patient population and is appropriate for market release.

14. Panel Recommendation

To be determined

15. CDRH Decision

To be determined

16. Approval Specifications

Directions for use: see labeling.

Hazards to Health from Use of the Device: see Indications, Contraindications, Warnings, Precautions and Adverse Events in the labeling.

Postapproval Requirements and Restrictions: to be determined